

February 6, 2006

Marlene Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Huntleigh Technology Group, Inc.  
Certification of CPNI Filing, February 6, 2006  
EB Docket No. 06-36  
EB-06-TC-060

Dear Ms. Dortch:

On behalf of Huntleigh Technology Group, Inc., I am submitting our certification and statement, pursuant to Section 64.2009(e) of the Commission's Rules, in accordance with the Commission's Public Notice, dated January 30, 2006 (DA 06-223).

Please refer any questions concerning this filing to undersigned.

Very truly yours,



Ross W. Dahman,  
President

CERTIFICATE OF  
CPNI USAGE COMPLIANCE

Company Name: Huntleigh Technology Group, Inc.

Address: 201 East Main, El Paso, TX 79901

As a corporate officer of this company, I hereby certify that, based on my personal knowledge, we have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

  
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Ross W. Dahman, President

Dated: February 6, 2006

Attachment  
Statement of CPNI Usage Operating Procedures

## STATEMENT OF CPNI USAGE OPERATING PROCEDURES

The operating procedures of Huntleigh Technology Group, Inc., are designed to ensure compliance with the CPNI rules applicable to them. Our procedures are as follows.

### CPNI Use

- (1) We use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- (2) We use, disclose or permit access to CPNI to provide or market service offerings among the categories of service —inter-exchange and information services — to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we use Customer's CPNI to cross market service to the Customer without their express approval; but if a Customer subscribes to only one service category, we do not use the customer's CPNI to cross market without the Customer's approval.
- (3) We use, disclose or permit access to CPNI derived from our provisioning of inter-exchange or information services for the provisioning of CPE and protocol conversion, without Customer approval.
- (4) Without Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we use, disclose or permit access to CPNI to provide inside wiring installation, maintenance and repair services.
- (5) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, we do not use call records or CPNI to track Customers that call local service competitors.
- (6) We do not use, disclose, or permit access to CPNI for the purpose of marketing by any third party.

### CPNI Approvals

- (1) When Customer approval to use, disclose or permit access to Customer CPNI is required, we obtain approval through written or oral methods. If we rely on oral approval, we understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval. We maintain all records of Customer approvals for at least one year.
- (2) Subject to "opt-out" approval requirements, we use a Customer's individually identifiable CPNI to market communications-related services to that Customer.

### CPNI Notice Requirements

- (1) We individually notify and inform each Customer of his or her right to restrict the use or disclosure of, and access to, CPNI along with a solicitation of approval, and we maintain records of that notification, whether oral or written, for at least one year.
- (2) Our notifications provide information sufficient to enable our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. Our notifications: (a) contain a statement that the Customer has a right, and we have a duty, under federal law, to protect the Confidentiality of CPNI; (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI, describe the purposes for which the CPNI will be used, and inform the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, we indicate that any approval, or disapproval, will remain in effect until the Customer affirmatively revokes or limits such approval or denial.
- (3) We advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and we clearly state that a denial of approval will not affect the provision of any services to which the Customer subscribes. However, we may provide a brief statement, in clear and neutral

language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we may state that the Customer's consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs and that we will disclose the Customer's CPNI to any person upon the affirmative written request of the Customer.

- (4) Our notifications are comprehensible and not misleading and, if written, are legible, sufficiently in large type, and placed in an area readily apparent to the Customer. And, if any portion of a notification is in another language, all portions of the notification will be in that language.
- (5) We do not include in the notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.
- (6) For "opt-out" approvals, our notifications satisfy (1)-(5). We do not use oral notifications except to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call. When we use oral notice in this manner, we comply with (1)-(5), except that, if none of the following situations are relevant to the limited use for which we seek CPNI, we will not (a) advise Customers, if they have opted out previously, that no action is needed to maintain the "opt-out" election; (b) advise Customers that we may share CPNI with our named or unnamed affiliates or third parties if the limited CPNI usage does not result in use by, or disclosure to, an affiliate or third party;
- (7) Disclose the means by which a Customer can deny or withdraw future access to CPNI, so long as we explain that the scope of the approval is limited to onetime use; and (d) disclose the precise steps a Customer must take to grant or deny access to CPNI, so long as we clearly communicate that the Customer can deny access to his or her CPNI for the call.
- (8) In addition, for "opt-out" approvals, we wait at least 30 days after giving Customers notice and an opportunity to opt-out before assuming Customer approval to use, disclose, or permit access to CPNI and notify Customers of the applicable waiting period for a response before approval is assumed. For mail notifications, the 30 days begins to run on the third day following the date the notification was mailed.
- (9) In addition, for "opt-out" approvals, we provide notices to our customers every two years, and we make available to every customer a method to opt-out that is of no additional cost to the Customer and is available 24 hours a day, seven days a week. We may satisfy this requirement through a combination of methods, but we allow Customers to opt-out at no cost and whenever they choose.

## **CPNI Safeguards**

- (1) We have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.
- (2) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place to deal with employee failures.
- (3) We maintain a record of our own sales and marketing campaigns that use Customers' CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We retain these records for at least one year.
- (4) We have a corporate officer who acts as agent for the Company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures adequate to ensure compliance with applicable CPNI rules. We provide a Statement accompanying the Certificate that explains our operating procedures and demonstrates compliance with the CPNI rules.
- (5) We are prepared to provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly. That notice would be in the form of a letter and would include the Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it would be/was implemented, whether relevant state commission(s) were notified and what action was taken, a copy of any notice provided to customers, and contact information. We would submit the notice even if other methods by which consumers may opt-out were offered.